

January 30, 2024

Hon. Judge John James McConnell Jr.  
Federal Building and Courthouse  
One Exchange Terrace  
Providence, RI 02903

**RECEIVED**

**FEB 07 2024**

**U.S. DISTRICT COURT  
DISTRICT OF R.I.**

**Re: United States vs. Macintyre**  
Criminal Case: 1:21-cr-00121  
Magistrate Complaint Case: 1:21-mj-22-LDA

Dear Judge McConnell:

This letter is respectfully submitted as a request that the magistrate complaint case (#1:21-mj-22-LDA) and the search warrant case and its associated documents, as well as any other associated magistrate cases and subpoenas, in the above-referenced criminal matter (1:21-cr-00121) be unsealed.

As an American-born citizen, and a member of the public, I have standing to request the unsealing of these documents due to a direct interest in the integrity of public records and proceedings. This request is grounded in the established right of public access to judicial records and documents, as affirmed by the United States Supreme Court. In landmark cases such as *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555 (1980) and *Press-Enterprise Co. v. Superior Court*, 478 U.S. 1 (1986), the Supreme Court upheld the principle that openness in judicial proceedings is crucial for maintaining the integrity and fairness of the judicial system. These decisions underscore the importance of transparency, particularly in criminal proceedings, where public scrutiny serves as a significant check on the judicial process. Further, under the First Amendment, documents may be sealed only if there are "overriding interests" requiring secrecy, and only if the proposed sealing order is effective and narrowly tailored to serve those interests.

In accordance with these principles, I believe that the unsealing of the aforementioned case and documents is essential to ensure public confidence in the judicial process and to uphold the democratic principles of transparency and accountability. Therefore, on behalf of the American public, which has a constitutional "right of access to criminal proceedings and documents filed therein," *CBS, Inc. v. U.S. Dist. Court*, 765 F.2d 823,825 (9th Circuit, 1985) I would like to respectfully request that any and all magistrate cases and search warrant cases, and their associated judicial records, in the above criminal matter (1:21-cr-00121) be unsealed and made available to the public.

I do not believe these cases are part of an ongoing investigation, as I have found in researching cases of the same nature, that many are already unsealed. Please see some examples below (additional can be provided if need be). Much of the information contained in these documents is already in the public eye, as referenced in these cases or the associated criminal matters.

| Case #                       | District                          |
|------------------------------|-----------------------------------|
| 5:20-mj-00044                | Northern District of Florida      |
| 1:20-MJ-00481                | Western District of Michigan      |
| 2:20-mj-00143-kjd            | District of Vermont               |
| 4:20-mj-03301                | Eastern District of Missouri      |
| 1:20-MJ-00255                | District of Maine                 |
| 1:20-mj-00243-LPA            | Middle District of North Carolina |
| 1:21-mj-00148, 1:21-MJ-00146 | District of New Hampshire         |
| 4:20-mj-05049                | Eastern District of Missouri      |
| 4:20-mj-07161                | Eastern District of Missouri      |
| 4:20-mj-08007                | Eastern District of Missouri      |
| 4:20-mj-08005                | Eastern District of Missouri      |
| 1:20-mj-236                  | Middle District of North Carolina |
| 1:20-mj-244                  | Middle District of North Carolina |
| 1:20-cr-00335                | Northern District of New York     |

Courts nationwide acknowledge a general right for the public to inspect and copy public records, including judicial records and documents. Further, they acknowledge that the burden of proving the necessity of sealing court records generally falls on the party proposing the sealing - in this case the Government. There is no compelling reason to continue sealing the magistrate cases or their associated documents.

In the Delaney case (1:20-cr-00335), the Judge unsealed numerous documents after two attorney's from the Department of Justice's Child Exploitation and Obscenity Section (CEOS) acknowledged that there were no longer reasons to seal certain exhibits and other information. Further, in this same case, The United States Government agreed that there was no reason to keep the magistrate case and documents sealed;

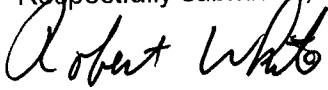
*"The United States has no objection to the unsealing of the search warrant materials in the*

*above case, and has submitted an unsealing application and proposed order so that may be Accomplished."* (See attached from Case 1:19-mj-00830-DJS, Document 7 Filed 11/29/23)

I would appreciate it if the court would direct the Clerk to provide access to unredacted, or if necessary redacted versions, of the sealed documents. If there are any additional fees or formal procedures required to process this request please let me know so that I can promptly comply with them.

Thank you for reviewing this letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert White". The signature is fluid and cursive, with the first name "Robert" and last name "White" clearly distinguishable.

Robert White

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